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March 1997

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Ms. Mary B. Powers
Kalamazoo County Commissioner
201 West Kalamazoo Avenue
Kalamazoo, MI 49007-3777

Dear Ms. Powers:

I am responding to your letter dated March 11, 1997, regarding the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (the Site). According to my staff, your letter is referring to an application for a polychlorinated biphenyls (PCB) storage permit from Drug and Laboratory Disposal, Inc. (DLD).

DLD submitted an application to commercially store PCB wastes at 331 Broad Street, Plainwell, Michigan. The maximum storage capacity requested is for 20 55-gallon drums plus an extra 5,000 gallon tank for emergency use. The United States Environmental Protection Agency (EPA) reviewed this application and found it to be in compliance with all the regulatory requirements for PCB storage. These requirements include an impervious storage floor, protection from weather, and curbing to assure containment and recovery of spilled PCBs. Compliance with these facility requirements along with operating requirements in the permit should assure that PCBs are never released to the environment from this facility. In the near future, following thorough review of public comments, EPA will make the final determination regarding whether to approve or deny this permit.

The Site is being addressed by EPA under the Superfund program, which the Congress of the United States has established to address the worst hazardous waste sites in the nation. EPA has delegated the lead for implementation of actions for this Site to the Michigan Department of Environmental Quality (MDEQ), under an agreement between the two Agencies. Under this agreement, EPA is

providing funding to MDEQ to conduct a risk assessment at the Site. EPA also provides technical support to MDEQ, conducts limited oversight, and provides approval for any final remedial actions. Since MDEQ is the lead Agency addressing this Site, it would also be appropriate for you to discuss your concerns with MDEQ. MDEQ has assigned the following project manager:

Scott Cornelius
Michigan Department of Environmental Quality,
Superfund Section
P.O. Box 30426
Lansing, MI 48909
(517) 373-7367

Although Congress has appropriated federal funds for taking actions at Superfund Sites, EPA prefers to have the polluter pay for or implement the remedial actions. Under an agreement with MDEQ, a group of paper companies, whose discharges caused the contamination, is conducting an investigation of the extent and nature of contamination at the Site. Thus far, the investigation has indicated that PCBs are the contaminants of primary concern and that the PCB contamination is primarily from residuals from the manufacture of paper generated from the recycling of carbonless copy paper between the 1950s and 1970s. Some paper residuals were disposed of by the paper companies in landfills along Portage Creek and the Kalamazoo River. Some of the residuals have flowed into Portage Creek and the Kalamazoo River and have contaminated sediments in these water bodies, especially in areas that were impounded. It should be emphasized that PCBs are no longer being generated by the paper companies, and that the paper companies' landfills along Portage Creek and the Kalamazoo River are no longer in active operation.

While the investigation of Portage Creek and the Kalamazoo River is ongoing, MDEQ is evaluating implementation of improved containment measures for a number of the landfills formerly operated by paper companies along Portage Creek and the Kalamazoo River. The objectives of these measures include preventing human contact with the PCBs from the landfills and assuring that the PCBs from the landfill do not migrate into the nearby Portage Creek or Kalamazoo River. It should be emphasized that these actions would provide for better containment of PCBs that are already in or near the landfill, and that disposal of PCBs from outside of the area is not being considered. EPA often approves containment measures, when they are effective in preventing

further migration of contaminants from a site, and when treatment measures are unreasonably expensive or are otherwise impractical. You can be assured that any proposal will be thoroughly reviewed by EPA before approval to assure that the containment measures will be effective.

Relative to the Bryant Mill Pond area, it is true that a large volume of sediments in this area are contaminated with PCBs, and that there is potential for these contaminated sediments to cause exposures to wildlife and to migrate farther downstream. This is also true in a number of sediment areas downstream from Bryant Mill Pond, although the Bryant Mill Pond area has the highest PCB concentrations among the sediment areas. Presently, Allied Paper is conducting further investigation and evaluation of the Bryant Mill Pond area to provide additional information that they believe is necessary for evaluation of potential remedial actions. MDEQ is overseeing this investigation.

If you have any further questions, regarding this matter, Please do not hesitate to contact me.

Sincerely yours,

/s/ MICHAEL D. ...

Valdas V. Adamkus
Regional Administrator